

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PATRICIA MORRIS-GIBSON, an individual

PLAINTIFF,

Case No.: 2:20-cv-11346-MAG-APP
Hon. Mark A. Goldsmith

v.

THE INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA (UAW), *et al.*

DEFENDANTS.

**PLAINTIFF PATRICIA MORRIS-GIBSON'S INITIAL
LIST OF EXHIBITS**

Plaintiff, Patricia Morris-Gibson ("Plaintiff"), through her attorneys, William Acosta, PLLC and Gerald K. Evelyn, identifies her initial list of exhibits as follows:

A. Plaintiff expects to offer the following exhibits:

1. Charge of Discrimination.
2. UAW's Position Statement to Charge of Discrimination
3. Plaintiff's Response to the UAW's Position Statement to Charge of Discrimination.
4. EEOC Notice of Suit Rights.
5. UAW Staff Manual.
6. UAW Sexual Harassment Policy.

7. 3-4-2019 Email from Plaintiff to Naghmana Siddiqi (“Siddiqi”) regarding returning to work.
8. 3-6-2019 Emails between Plaintiff and Naghmana Siddiqi regarding returning to work on March 11, 2019.
9. 3-11-2019 Emails from Siddiqi that she confirmed with Foster and Rioux regarding Plaintiff’s return to work.
10. 3-11-2019 Email from Joe Rioux to Plaintiff regarding reporting to work.
11. 3-26-2019 and 4-1-2019 Emails between Plaintiff to Siddiqi regarding Plaintiff’s employment file.
12. 4-1-2019 Email from Siddiqi to Jeff Shrock (“Shrock”) regarding Plaintiff’s IME.
13. 4-2-2019 Plaintiff Interview Notes
14. 4-4-2019 Foster Interview Notes
15. 4-5-2019 Darryl Bragg Interview Notes
16. 4-8-2019 Hardy Interview Notes
17. 4-5-2019 Anthony McNeil Interview Notes
18. 4-16-19 Investigation Note to File
19. 4-16-2019 Email to Foster regarding Disciplinary Notification
20. 4-17-2019 Investigation Note to File
21. 4-25-2019 Emails between Plaintiff and Scott Andrews regarding Sexual Harassment Report.
22. 4-29-2019 Emails between Plaintiff and Scott Andrews
23. 6-13-2019 Emails between Siddiqi and Shrock regarding

24. IME Report of Dr. Shiener.
25. IME Report of Dr. Beltzman.
26. 11-14-2019 Email from Siddiqi to Plaintiff regarding Beltzman IME Report.
27. Plaintiff's List of Preferred Assignments.
28. Records of meeting reassigning Plaintiff.
29. Plaintiff's W-2s/Fringe Benefit Statements for 2016 – Present
30. Plaintiff's Pay History
31. 2020 Staff Council Agreement
32. 2020 Annual Funding Notice for UAW Staff Retirement Income Plan.
33. 2020 Annual Funding Notice for UAW Staff Cash Balance Retirement Plan.
34. 2019 Annual 401(d) Safe Harbor Notice.
35. 2019 Annual Funding Notice for UAW Staff Retirement Income Plan.
36. 4-23-21 Memorandum from Rory Gamble that Plaintiff is off payroll.
37. 5-17-2021 Letters from UAW to Plaintiff regarding Retirement Benefit.
38. Report of Dr. Michael Thomson regarding Plaintiff's Economic Losses.
39. Plaintiff's medical records of treating physicians.
40. Pharmacy Records of Plaintiff's Medications.

41. Demonstrative Exhibits

42. Photographs

B. Plaintiff may offer the following exhibits:

1. 8-29-18 Letter from Rascha Azakir regarding Foster attending therapy and returning to work.
2. Text Messages between Plaintiff and Co-workers
3. All exhibits identified by Defendants.
4. Rebuttal exhibits, as necessary.
5. Documents produced by Defendants in discovery.
6. Documents identified in discovery.

Plaintiff reserves the right to supplement and/or amend its Exhibit List, up to and through the time of trial.

Respectfully Submitted,

/s/ Avery K. Williams

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Dated: May 20, 2021

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2021, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

/s/Avery K. Williams

Avery K. Williams (P34731)

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